REMARKS

This amendment is being filed in response to the Office Action mailed May 15, 2007. In that Office Action, claims 1-18 were rejected on prior art grounds. Claims 7-12 are being cancelled. Accordingly, claims 1-6, and 13-18 are pending in the application. Although claims 7-12 have been cancelled, the cancellation of these claims is without disclaimer of the subject matter thereof and without prejudice to Applicants' right to later pursue the subject matter of those claims in this or another application. No amendments are being made to the remaining pending claims.

The undersigned had a brief telephone interview with the Examiner to gain an understanding of the claim objections and §112 rejection contained in the Office Action. The Examiner's clarification of these portions of the Office Action is incorporated into the comments below.

Claim Objections

Claims 1 and 7 stand objected to on the basis that the recitations of "determining **a** speech input context for the received speech input stream" should be changed to "determining **the** speech input context for the received speech input stream." However, Applicants respectfully assert that the claims as originally filed are correct, because (1) there could be more than one context that could exist for a particular speech input stream and (2) there is a difference between "a speech input <u>stream</u>" and "a speech input <u>context</u>" so that the previous reference to "a speech input stream" is not a reason to refer to "the" speech input context. Therefore, the indefinite article "a" before speech input context is correct. Reconsideration and withdrawal of the objection is respectfully requested.

Rejection Under 35 USC § 101

Claims 7-12 stand rejected under 35 U.S.C. § 101 because the claimed invention allegedly is directed to non-statutory matter. Applicants assert that the rejection of claims 7-12 is now moot in view of the cancellation thereof. Accordingly reconsideration and withdrawal of the rejection is requested.

Rejections Under 35 USC § 112

Claims 6, 12, and 18 stand rejected under 35 USC § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as the invention. More specifically, it is asserted that the claims have been interpreted to mean directing the device function based on the processed speech input. Applicants respectfully assert that the Office Action fails to include a *prima facie* § 112 rejection because the Office Action fails to provide sufficient reasoning as to precisely how or why claims 6, 12, and 18 are indefinite.

Moreover, Applicants disagree with the Examiner's characterization that claims 6, 12, and 18 mean directing the device function based on the processed speech input. This may be true indirectly, but that is not what the claims say. Rather, claims 6, 12, and 18 mean precisely what they say: directing a vehicle device in control of the enabled device function of the vehicle based on the processed speech input stream. This inventive subject matter is exemplified in Applicants' detailed description as originally filed at least in paragraph 0031 of the published application and with reference to Fig. 2, step 250. This example is further described in conjunction with Fig. 5 at paragraph 0038. As one particular example, where the speech input stream is a phone number, the enabled vehicle function can be a personal telephone call and the vehicle device in control of this can be an in-vehicle phone, such that the phone places the call based on the telephone number. Thus, to use the language of the claim, the method involves "directing a vehicle device [the in-vehicle phone] in control of the enabled device function [the personal call] of the vehicle based on the processed speech input stream [the telephone number]." This language and meaning is clear to those skilled in the art. Accordingly, reconsideration and withdrawal of the rejection under 35 U.S.C. § 112 is respectfully requested.

Rejection Under 35 USC § 102

Claims 1, 2, 5-8, 11-14, 17, and 18 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Brems (U.S. Patent 6,505,161). Applicants assert that the rejection of claims 7, 8, and 10-12 is now moot in view of the cancellation of those claims. As to claims 1, 2, 5, 6, 13, 14, 17, and 18, Applicants respectfully traverse the rejection because

Applicants' inventions of independent claims 1 and 13 are patentably distinguishable and not anticipated by the cited reference.

Brems addresses the problem of differences in quality between various types of devices used to send messages to speech recognition systems, wherein speech models that achieve high-quality recognition for one type of device may not achieve high quality recognition if used to recognize speech for other types of devices. Accordingly, Brems teaches using a particular device to send a message including the device type to a network-based speech recognition system, wherein the system is then optimized for the particular device using speech models and parameters associated with that particular device type. More specifically, Brems discloses that a user device, such as a cellular telephone 100, sends an access request to a speech recognition system (SRS) 106 (step 400), a network supervisor is activated (step 402), and then the type of the user device is determined (step 404). Next, the user device sends a message type, such as DTMF tones or the like, to the SRS (step 406), the SRS receives and decodes the message (step 408), and device-type information is used to obtain correct speech models from a database (step 410). Thereafter, a user speaks a <u>command</u> into the user device (step 414), and the SRS executes a recognition algorithm using the speech models to recognize the command (step 416). A services module is used to execute the recognized command, such as to make a call or access voice mail (step 418).

With respect to the rejection of originally filed independent claims 1 and 13, the Brems reference fails to disclose each and every element as arranged in these claims. Applicants' independent claims 1 and 13 each recite, *inter alia*, determining a speech input context for a received speech input stream, processing the received speech input stream based on the determination, and enabling a device function of a vehicle responsive to the processed speech input stream. Nowhere in the Brems reference is there any disclosure regarding determining a speech input context for the received speech input stream, much less processing the received speech input stream based on that determination and enabling a vehicle device function responsive to the processed speech input stream.

Rather, Brems discloses that a speech recognition system receives a <u>command</u> from a user, executes a speech recognition algorithm to recognize that command, and then uses a services module to execute that command. But reception, recognition, and execution of a command is not similar, much less identical, to Applicants' claimed step of determining a speech input <u>context</u> for a received speech input stream. Those of ordinary skill in the art of speech recognition technology know that determining or recognizing a command involves identifying a speech input as a particular spoken word or words corresponding to a directive to take some action, whereas determining a speech input context is more akin to identifying a <u>type</u> of input speech content (e.g., phone number versus street address). Applicants' method and system as recited in the claims enables this determination to be used to automatically carry out a device function (such as mapping on a GPS navigation display based on a received address or placing a telephone call based on a received number). In this regard, the claimed invention can be used in some instances to eliminate the need for providing a command (such as "dial" some number). Thus, determining "a speech input context" is different and not obvious in view of recognizing commands, as is done in Brems.

Therefore, independent claims 1 and 13 are distinguishable over the Brems reference. For the same reasons, claims 2, 5, 6, and 14, 17, and 18, which depend respectively from claims 1 and 13, are also distinguishable over the Brems reference. Thus, reconsideration and withdrawal of the § 102 rejection of claims 1, 2, 5-8, 11-14, 17, and 18 is respectfully requested.

Rejections Under 35 USC § 103

Claims 3, 4, 9, 10, 15, and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brems as applied to claim 1, in view of Deisher (U.S. 2004/0002866). Applicants assert that the rejection of claims 9 and 10 is now moot in view of the cancellation of those claims. Applicants traverse the rejection of claims 3, 4, 9, 10, 15, and 16 because Applicants' inventions of dependent claims 3, 4, 9, 10, 15, and 16, are patentably distinguishable and not obvious in view of the cited references.

Deisher is directed to the expense of adding speech recognition systems to mobile electronic devices. Accordingly, Deisher teaches using an intermediate device 110 to carry out automatic speech recognition for a subject device 105 in communication with the intermediate device 110. The subject device 105 includes a subject speech module 115, and the intermediate device includes an intermediate speech module 125, and an automatic speech recognition (ASR) system 135. The subject speech module 115 of the subject device 105 may contain a set of grammars, dialogue structures, and vocabularies for voice access of the device's speech capabilities. Information regarding the speech capabilities is communicated 140 to the intermediate speech module 125 of the intermediate device 110. The automatic speech recognition (ASR) system 135 of the intermediate device 110 provides speech feature extraction, acoustic modeling, speech recognition, and speech understanding capability. A user provides voice <u>commands</u>, which are extracted and understood by the automatic speech recognition system 135, and the intermediate speech module 125 then communicates the commands to the subject speech module 115, which interprets the commands as instructions for the subject device 105.

Before addressing claims 3, 4, 15, and 16, Applicants note that Deisher does not make up for the above-noted deficiencies of Brems. In particular, Deisher does not disclose or render obvious the limitations from claims 1 and 13 of determining a speech input context and then using that to process a received speech input stream. Accordingly, these claims are allowable based on their associated independent claims.

In Applicants' dependent claims 3, 4, 15, and 16, a set of rules and structures for formatting a speech input stream are accessed according to a determined speech input context. The suggested combination of Brems and Deisher does not teach or render obvious this feature of those claims. Contrary to the assertion on page 6 of the Office Action, Deisher does not disclose any accessing of a set of rules or any formatting of speech input. What Deisher actually discloses is that the subject device expects certain speech formats (referring to certain defined spoken commands) and communicates the formats to the intermediate device. But having a passive expectation of a speech format and simply relaying that format to another device does not amount to Applicants' claimed

step of formatting a speech input stream according to a determined speech input context using rules and structures. Thus, apart from the missing limitations from the base claims as described above, the combination of the Brems and Deisher references also fails to disclose the limitations expressly recited in claims 3, 4, 15, and 16.

Accordingly, dependent claims 3, 4, 15, and 16 patentably define over the combination of Brems and Deisher. Therefore, reconsideration and withdrawal of the § 103 rejections of claims 3, 4, 15, and 16 is respectfully requested.

PTO-892

Applicants note that the Notice of References Cited, PTO-892, is incorrect for listing U.S. 6,597,018 to Nei, and should be corrected to cite U.S. 6,598,018 to Junqua, which was apparently cited on page 7 of the Office Action.

In view of the foregoing, Applicants respectfully submit that all claims are allowable over the prior art and reconsideration is therefore requested. The Examiner is invited to telephone the undersigned if doing so would advance prosecution of this case.

The Commissioner is hereby authorized to charge Deposit Account No. 07-0960 for any required fees or to credit that same deposit account with any overpayment associated with this communication.

Respectfully submitted,

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